20. As set out in these Schedules, CLECs may locate equipment used for interconnection or access to network elements on an unbundled basis in their secured collocation space, and may install, operate, and maintain their own equipment within that space. Physical collocators may arrange with SWBT for the installation of cross-connections between their equipment and SWBT's unbundled network element facilities, and for trunking to other SWBT offices. In addition, physical collocators may place facilities allowing them to interconnect with other physically collocating carriers in the same central office. (47 U.S.C. §251(c)(6) and 47 C.F.R. §51.321(e); §51.323(a),(h),(i)).

21. To better serve CLECs, SWBT issues revisions to the basic physical collocation agreement and the technical publication governing physical collocation. These revisions reflect changes made by SWBT to accommodate CLECs' concerns raised during negotiations and/or arbitrations. All CLECs, however, have access to terms on a nondiscriminatory basis pursuant to 47 U.S.C. §251(c)(6), and are able to opt into signed collocation agreements pursuant to the "most favored nation" clauses of SWBT's STC and carrier-specific agreements.

ii. Physical Collocation Job Intervals

22. As set out in Schedules 5 and 6, SWBT accommodates requests to modify its offices for physical collocation within time intervals that are the shortest appropriate intervals based upon SWBT's experience with this process, unless other intervals have been ordered in an arbitration award from a state commission.

23. SWBT will provide a quotation of estimated charges within 35 business days of receiving a complete application for physical collocation, unless there are unusual circumstances, such as the submission of a large number of requests in a single city or the application is incomplete or inaccurate.

24. Quote preparation is a time-intensive process, which involves several items. First, the application is reviewed to determine if the data is sufficient for engineering and cost determinations. If so, it is then distributed internally to Network Sales Support, Network Engineering, Power Engineering, Network Maintenance, Outside Plant Engineering, Real Estate Management and Project Management. A site visit by these groups is necessary in connection with every physical collocation application to determine the placement of the new cage. If space is available, a construction interval is developed, as well as a cost estimate from each of the various groups along with a floor plan sketch of the space. Estimated costs are compiled and reviewed and forwarded to Cost Studies for determination of the total non-recurring and recurring charges. Once these costs and charges are reviewed, the Account Manager compiles the entire quotation, including the interval and any applicable contract documents, and forwards it to the CLEC. SWBT has signed a stipulation that commits the company to complete construction within 90 days unless extenuating circumstances exist (e.g., where there is a need for additional power and air conditioning required for RSMs).

25. All "requests for quotes" for physical collocation in Oklahoma have been provided on a timely basis, within the 35 business day interval, as specified in SWBT's guidelines.

26. SWBT has a dedicated group of account managers who are responsible for handling all collocation requests. These managers are in place to ensure that SWBT efficiently and accurately processes the CLECs' requests. SWBT has sized its collocation support organization to readily handle expected demand for physical collocation but the timing and size of CLEC requests can impact SWBT's ability to meet demands for physical collocation. Although SWBT has adjusted its staffing levels with changes in demand for collocation, these adjustments cannot be made instantaneously. To make sure that all CLECs are aware of the potential for delay created by submission of multiple requests on a single day or in a very short period of time, SWBT has amended its Technical Publication to advise CLECs that intervals may need to be staggered under such circumstances. (See Schedule 6, Section 4A, Page 1.)

27. Once the quotation is provided, requesting CLECs have up to 65 business days to either accept or reject SWBT's estimate and proposed construction interval. Typically, during this period, as with any other commercial negotiation, the CLEC and SWBT account manager discuss the estimates and explore possible revisions that may allow SWBT to better meet the CLEC's requirements. As a result of these discussions, SWBT often is requested to and does provide revised price and interval quotations. Utilizing this very process, one CLEC was able to modify its request to increase its capacity while at the same time reducing its non-recurring charges by more than $174,000, and recurring charges by more than $400 a month.

28. Attached as (Proprietary) Schedule 7 to my affidavit is a copy of the revised price quote provided to that CLEC on March 19, 1997, in response to its request for collocation in the Oklahoma City-Central office. The CLEC originally requested collocation in this office on August 14, 1996. After discussions were held to clarify the request, and the last revision was received from the CLEC (on October 1, 1996), a quotation was provided on November 7, 1996. During the 65-day "post-quote" period, several face to face meetings were held concerning the arrangement that would meet the CLEC's needs. As a result of these meetings, the CLEC made several changes to its request, including the following:

- Reduction of its space requirement from 400 to 300 square feet;
- Increase in the number of transmission facilities required (both DSO and DS3); and
- Change in the power requirements from a non-standard arrangement requiring a new power plant, to a standard arrangement which could be served off of the existing SWBT power plant.

This shows how the negotiation process can be used by a CLEC to better suit its specific needs. It also shows the benefits gained from SWBT's and CLECs' growing experience with collocation arrangements.

29. Preparation of collocation space involves many different work groups performing a variety of different tasks. The following outlines what happens in the preparation of the collocation space once a CLEC accepts SWBT's quote.

30. First, SWBT Account Manager notifies SWBT Network Sales Support (NSS) that a CLEC has accepted a quote by remitting the appropriate payment. Within 5 business days of that notification, SWBT's NSS group will notify all necessary

departments to proceed with construction of the space. During the construction period several things occur.

- The electrical, heating, and cooling system in the central office is modified and/or augmented as necessary to meet the requirements specified by the CLEC. Asbestos abatement will be accomplished as necessary. If the existing flooring has loose or broken tiles, it may be necessary to replace them. A secure access path to the common area of the collocation space is constructed. A secure path means that a CLEC will not be required to have a security escort but will be able to enter and exit the collocation area at will. Providing the secure path may involve the placement of locks and/or card reader systems as well as possible construction of partitions between the collocation area and SWBT's equipment areas.
- The cage itself must also be constructed including proper grounding requirements. An order for the caging material is placed, and a vendor is contracted to construct the cage. Once the cage is constructed, the Project Manager holds a meeting between the CLEC, SWBT engineers, SWBT architects, and the SWBT Account Manager to review the placement of the CLEC's provided equipment and where the CLEC would like to have AC power outlets and fiber pull boxes placed. Cable racking is then placed and cabling is installed between SWBT equipment locations and the collocation space. Power cabling is also placed between the SWBT power distribution panels and the collocation space; and the Point of Termination (POT) frame

is installed in the collocation space. (This last step is done only if SWBT is providing the POT Frame. The CLEC has the option of providing the POT Frame on its own.) Once transmission cabling is placed, it is terminated at both ends and a continuity test is performed to ensure electrical continuity from end to end. The equipment is then stenciled with frame location identification numbers so SWBT and the CLEC can determine which cable in the collocation space corresponds to which cable in SWBT's equipment space. At any time during this process there are a number of things that can impact the completion of the physical collocation. Some of the problems SWBT has faced in the past include the equipment (cabling, cable racking, cage material, connector blocks, etc.) being delayed in shipping by the outside vendor. Unforseen problems with the space (i.e., high pressure water lines too close to the equipment area), and/or the CLEC revising its requirements or failing to provide the necessary floor plan drawings of the equipment to be installed in the collocation space.

- Once all of the above work is completed, the collocation space is ready to turn over to the CLEC. The SWBT Account Manager then notifies the CLEC that the space is ready for occupancy and with payment of the remaining quoted price the CLEC can proceed with its equipment installation.

31. Once the CLEC has completed installation of its equipment in the collocation space, joint testing for continuity of all cabling (as required) is conducted. Also, a

maintenance review is held with both SWBT and the CLEC to ensure that the installation does not pose any safety hazards or threats to either network.

iii. Current Physical Collocation Status

32. Attached as Schedule 8 is a chart showing the status of completed physical collocation jobs in Oklahoma. As explained by Mr. Deere, SWBT has 14 working physical collocation arrangements in place in Oklahoma with four CLECs. In addition, SWBT has completed work on one additional collocation cage, although the CLEC has yet to begin its installation process for that order. Three more jobs are in progress.

33. In addition to providing initial physical collocation, SWBT has completed 11 supplemental jobs for additions to power or transmission facilities in existing physical collocation arrangements.

34. To date, SWBT's average build-out interval for new collocation jobs in Oklahoma is 88 days. With regard to these intervals, some commitments were missed in early 1997. This was due, in most instances, to the need for new materials. For example, the welded wire cage materials needed to ensure proper grounding for the cage were not readily available from the vendor in the quantities needed. SWBT has resolved this problem by stocking many of these items in its warehouses and working closely with the suppliers to ensure no similar shortage problems occur. One missed date was due to a change initiated by the customer on the date SWBT was to turn over the collocation cage. When the physical collocator visited the

collocation area, it determined that a building modification would be required to meet its needs. SWBT resolved the issue within two weeks from the date when the need for the modification was discovered.

35. Besides accommodating the requests so far received, SWBT has continued to improve its policies, procedures and methods for implementing physical collocation. Improvements to SWBT's collocation process include the following:

- Access to Facilities: In response to the requests of several carriers, SWBT allows requesting carriers early access to their collocation space in order to begin their equipment installation before SWBT has completed its initial work. This allows collocating carriers to speed up the collocation process by working in parallel with SWBT on the installation process. One CLEC has used this process at many of its Oklahoma locations.
- Pre-Installation Meetings: To minimize last minute revisions, SWBT has implemented the practice of meeting with physically collocating carriers and their installation vendors, prior to providing access to the collocation cage. The purpose of these meetings is to ensure that the physically collocating carrier has all the information necessary to perform its installation work within SWBT's central offices, and to explain particular details of the access to the central office area, such as the loading dock. These meetings have reduced the need for last minute changes and revisions and have improved communication between Soutwestern Bell and CLECs.

- Collocation Project Managers: SWBT has assigned Collocation Project Managers in each of its 5 states. The Project Managers have responsibility for physical collocation implementation in each of their states. Since June of 1997, the Project Managers have held monthly meetings to discuss the collocation process and procedural issues that have arisen in their areas. As a result of these meetings, issues have been resolved and practices modified to make physical collocation faster and more efficient for the physically collocating carriers. For example, as a result of these meetings, a physical collocation "checklist" was developed which is being used to ensure that all SWBT employees involved in the process fully understand and uniformly implement their respective collocation responsibilities. A copy of this checklist is attached as Schedule 9.
- Flexibility and Responsiveness: SWBT continues to accommodate special requests for assistance from physically collocating carriers.
  a) In one case, the CLEC installed equipment within the cage area that was not within the prescribed technical specifications. Rather than requiring the CLEC to remove and replace this equipment at great expense and delay, SWBT reviewed the equipment installed and provisionally allowed the CLEC to keep the equipment in place. A letter relating to this situation is attached as (Proprietary) Schedule 10.
  b) SWBT also has been very responsive to requests from carriers for additions to their collocations. For example, one CLEC requested

additional power at 10 locations in Oklahoma. SWBT provided quotes on these requests on an accelerated basis, and the jobs were completed in an expedited manner, all in 35 days or less. The CLEC had initially underestimated the amount of power it would need for its equipment it already had in place, so the expedited handling of these requests was critical to the CLEC.

iv. Physical Collocation Pricing Policy

36. SWBT offers physical collocation on a non-discriminatory basis and at just and reasonable rates. SWBT's pricing policy allows SWBT to recover its actual costs.

37. In Oklahoma, SWBT prices physical collocation by estimating the cost for constructing the cage and associated areas, and then "truing-up" these costs after the job has been completed. This process was selected as an alternative to making a CLEC wait for a quote based upon firm prices from SWBT's contractors and subcontractors before starting work and is consistent with the Oklahoma Corporation Commission's decision in the AT&T Arbitration, Cause Nos. PUD960000218 and 970000175.

38. SWBT also allows physically collocating carriers the option to elect to install their own equipment, including the POT frame, within the collocation cage. Thus, carriers are able to purchase the required material and install it themselves or have it installed by a third party. After installing its own POT frames in 22 locations,

one CLEC has decided to allow SWBT to place the POT frames in all future applications for collocation.

39. After SWBT receives all bills from its subcontractors, each involved department reviews the actual costs versus their original estimate. The variances are summarized by the Network Sales Support group and sent to Cost Studies so that revised monthly charges can be developed. This information is then compiled and summarized and sent to the physical collocator. The physical collocator's bill is then either debited or credited by the appropriate amount. This process ensures that all CLECs are charged only the actual costs to complete the construction and installation of equipment for their collocation arrangement. In Oklahoma, SWBT has completed 11 true-ups for completed jobs. The result of those true-ups is that, in all cases, SWBT's quotes were lower than actual costs, although actual charges did not deviate from estimated costs more than 18%.

40. SWBT charges the first collocating carrier in a Central Office (CO) the cost to build out the "common" areas of the collocation space. As additional CLECs lease collocation space in the same central office, the original common area build-out charges are prorated to the new collocators and refunded in appropriate percentages to the previous physical collocator or collocators.

41. (Proprietary) Schedule 11 is the actual cost analysis (true-up) for a CLEC in Oklahoma City - Central collocation space and is illustrative of physical collocation charges. The category "Common Work" includes charges for building out the entire common space, including removal of asbestos and placement of new floor tile, cage

walls for collocation hallways, air conditioning ductwork, light fixtures, a card reader system, and fiber conduit from the cable vault to the collocation area. Since the first physical collocation was completed, other CLECs have also collocated in the Oklahoma City - Central location. The other CLECs will each be charged one-third of the $110,237 total (or $36,746 per CLEC) charged to the first physical collocator. That money will be refunded to the first collocator.

42. To illustrate some of the other charges for physical collocation, referring again to Schedule 11, the category "Specific Work" refers to such items as cage material and installation, lights, electrical outlets, fiber conduit to the specific cage, and contractor fees, while "Cost of Equipment" may include such items as the power panel(s), power cables, transmission cables (for DS3s, DS1s and DS0s), cable racking, ground cables, and frame connector blocks for terminating the voice grade cables.

43. There are four (4) categories of monthly costs including equipment, conduit, space rental, and power. These charges recover SWBT's costs to lease (conduit) and/or maintain equipment (power plant, cabling, etc.), monitor alarms, provide the building space, utilities and services.

44. Upon request, SWBT will provide recent collocation quotes (with carrier specific information redacted) which will allow CLECs requesting collocation to verify the reasonableness of SWBT's prices and estimate the charges associated with various alternative arrangements. An example of the types of information contained in these quotes is provided in Schedule 7.

B. VIRTUAL COLLOCATION

45. SWBT provides CLECs virtual collocation for the purpose of interconnecting with SWBT's facilities and equipment and for access to network elements on an unbundled basis. The Act requires that virtual collocation be made available by SWBT where physical collocation is not available due to space or technical constraints. SWBT, however, allows CLECs to choose virtual collocation even when physical collocation is available. A CLEC may utilize the same virtual collocation arrangement for purposes defined in the FCC's expanded interconnection dockets, and for interconnection with SWBT's network and access to network elements on an unbundled basis.

46. SWBT generally provides virtual collocation to CLECs at the rates, terms and conditions set out in SWBT's federally tariffed virtual collocation arrangements. SWBT has, however, expanded on its federally tariffed virtual collocation offering in three ways. First, SWBT allows virtual collocation to be used as a means of interconnection with SWBT's network as well as a means of access to unbundled network elements in addition to the purposes determined in the FCC's expanded interconnection dockets. Second, SWBT does not require a CLEC to bring its own transmission facility to SWBT's central office in order to collocate on a virtual basis. Third, a CLEC may connect its virtual collocation arrangement to other carriers collocated in SWBT's central office.

47. During the expanded interconnection dockets, the FCC required that extensive cost information be filed and then established SWBT's current virtual collocation rates based on its review of that cost information.

48. The CLEC also may request to collocate equipment other than that which is currently available under SWBT's federal tariff through the normal application process. New equipment will be provided on an individual case basis at rates which are based on the cost of the equipment.

49. As of December 31, 1997, SWBT was providing three (3) virtual collocation arrangements to two (2) CLECs in Oklahoma. There were also two (2) virtual collocation jobs pending on that date.

ACCESS TO NETWORK ELEMENTS ON AN UNBUNDLED BASIS

A. General Unbundling Rules

50. SWBT provides "nondiscriminatory access to network elements on an unbundled basis at any technically feasible point in a manner that allows requesting carriers to combine such elements to provide such telecommunications service." This requirement was initially interpreted, by the FCC, to require LECs to provide network elements separately for a separate charge and also to require that LECs combine elements on behalf of requesting carriers. However, the Eighth Circuit Court of Appeals removed the requirement that the LEC combine elements for requesting carriers, holding that the LEC's requirement to provide access to network elements is limited to providing access on an unbundled basis and in a manner that allows the CLEC to combine the network elements themselves to provide telecommunications service.

51. SWBT's agreements to provide unbundled access include various access methods ranging from access to a loop at the end user customer premises through the network interface device to a choice of access to elements at SWBT central offices which includes collocation as well as other nondiscriminatory methods of access which allow the CLEC to combine the elements. The technical aspects of these various access choices are described in Mr. Deere's affidavit. Each method of access to network elements has its own unique advantages for the CLEC. For example, with collocation, the CLEC has the ability to combine its own facilities with SWBT network elements to provide services. Carriers can also choose other

access methods and avoid the need to own construct any portion of a telecommunications network. To illustrate how a CLEC can provide complete service without the need to own any of their own facilities through the use of UNEs, Schedule 12 to my affidavit illustrates the elements and the charges that a CLEC would use to provide service equivalent to SWBT's single line local exchange service. As a means of comparison, Schedule 12 also includes the charges for an equivalent SWBT single line flat-rate business local exchange service offered on a resale basis and a comparison to SWBT's Network Component Service (NCS) offered through the STC.

B. Intellectual Property Rights of Third Party Vendors

52. SWBT offers unbundled network elements with the same features and functions as those currently employed for SWBT's services. SWBT continues to pay third party vendors the Right To Use (RTU) fees (if any) associated with features provided to CLECs, just as it does for features used to serve SWBT retail customers. Because SWBT's contracts with vendors do not allow SWBT to convey its RTU to a third party, however, SWBT requires CLECs to indemnify SWBT against third party claims for violations of intellectual property rights resulting from the CLECs own use of unbundled elements obtained from SWBT. As the Oklahoma Commission determined, "...CLECs should get their own licenses." Even though the RTU on features is paid by SWBT and is a cost to SWBT to provide those features, these costs are not included in the rates proposed in the Oklahoma cost docket.

C. SWBT's Billing for Shared Transport Services

52. In order to implement the requirements of the FCC's Third Order on Reconsideration or "Shared Transport" order, SWBT is working to implement its own solution to an industry-wide problem. Basically stated, this problem arises from the fact that the Public Switched Network (PSN) is not designed to distinguish the access usage associated with the unbundled switch ports of multiple CLECs in a single switch. As a result, SWBT currently is unable to to measure the interexchange access traffic associated with service provided by individual CLECs through use of SWBT's unbundled network elements. This in turn means that SWBT is unable to provide data to the CLECs that would enable them to bill appropriate access charges to IXCs. The steps being taken by SWBT are described in the Affidavit of Elizabeth Ham.

53. Under current FCC rules, CLECs are entitled to collect access charges from customers they serve through the use of unbundled network elements obtained from SWBT. By the same token, SWBT is entitled to bill its CLEC UNE customers a usage sensitive charge for switching and transport, including the switching and transport associated with the CLEC's provision of access services. Until a solution to the problem outlined above is implemented, SWBT will credit a requesting CLEC's account on a monthly basis with the difference between the estimated interexchange access charges attirbutable to the subscriber lines served by that CLEC, and the usage sensitive amount SWBT charges the CLEC for switching and transport on access-related calls.

WHITE PAGES LISTINGS

57. Section 271(c)(2)(B)(viii) of the Act requires SWBT to provide "[W]hite pages directory listings for customers of the other carrier's telephone exchange service." SWBT does this by ensuring that its directory publishing affiliate publishes the primary listing of the CLEC's customer located within the geographic scope of SWBT's White Pages directories. These listings are included within the listings of SWBT customers. In addition to providing listings, SWBT provides initial and secondary delivery of White Pages directories to customers of resellers on the same basis as it does to its own customers. Upon request, SWBT also delivers White Page directories to customers of facility-based CLECs, or delivers directories in bulk to a single address designated by the requesting carriers. SWBT also has in place methods and procedures by which a requesting CLEC can obtain additional copies of White Pages directories subsequent to the normal directory distribution cycle. Finally, SWBT provides access to its White Pages directory listings in readily accessible magnetic tape or electronic format. (Cox Sec. 19.1, App.WP; Dobson Attach 1: Resale - App.WP, Attach. 19: WP (other); ASCI Sec. 20.1 App.WP; Intermedia Sec. VI.C, App.WP, App. Resale)

58. A White Pages end-user listing is provided a CLEC providing resale services in the same manner as SWBT provides the listing to its own retail customers. Listing information pertaining to resale services is included alphabetically, aggregated with SWBT end user listings. In Oklahoma, SWBT directories contain approximately 8000 listings of CLEC resold telephone numbers. Facility-based CLECs may

choose either to have their end user listings included alphabetically with SWBT end user listings, or to have a separate section following the main section of SWBT end user listings. The total number of listings for Oklahoma facility based CLECs in SWBT's directories is over 800. All CLEC subscriber listing information is included in the SWBT White Pages in the same type and format as SWBT subscriber listing information.

59. SWBT manages CLEC White Pages listing information in the same manner as it does its own. The Directory White Pages database contains information pertinent to how the end user listings will appear in the White Pages Directory, such as end user name, address, and listed telephone number. In addition, the database contains directory delivery information regarding the number of directories to be delivered and where those directories should be delivered.

60. SWBT makes available, to all requesting CLECs, Primary, Additional and Foreign listings under the terms and conditions contained in the CLECs' respective interconnection agreements. A Primary listing is associated with the end user subscribing to the local telephone service. An Additional listing is one that is requested by an end user which pertains to, or is associated with, the Primary listing. A Foreign listing is one that does not fall within the local scope of the directory in which it is listed. Each of these types of White Pages listings will contain a name, address and telephone number.

61. SWBT determines whether a listing is Primary or Foreign based on the geographic scope of the directory. Geographic scope is in turn based on the SWBT serving

exchanges that are in the local calling area. As an example, the telephone number prefix of 491 in the 405 Area Code is included in the Oklahoma City White Pages directory. All published end user listings with the 491 prefix (i.e., 491-XXXX) will appear in the Oklahoma City White Pages, along with other serving exchanges which are geographically included in the Oklahoma City White Pages directory.

62. If the CLEC's local calling scope differs from SWBT's geographic scope for a particular White Pages directory, and the CLEC wants to include its listings in a directory outside the scope of the local directory, the CLEC may list such end user listing information in SWBT's White Pages on a Foreign listing basis.

63. SWBT also makes available to requesting CLECs for their end users, enhanced White Pages residential listing products, such as Signature listing, Lines of Distinction and Personality Logos. Signature listings are distinctive listings associated with a residence listing and can either be contemporary bold or script. Lines of Distinction permit a residential end user to add a customized, extra line of information to a Primary or Additional listing in order to further describe the listed party. Personality Logo allows the residential end user to add a logo (selected from choices provided by SWBT) to a Primary or Additional listing and enclose that listing in a box frame. These enhanced residential listing products are made available to requesting CLECs pursuant to the terms and conditions contained in the respective CLEC interconnection agreement.

64. CLECs requesting business listing enhancements and Yellow Page advertisements for their business end users are referred to Southwestern Bell Yellow Pages, a separate, non-regulated affiliate of SWBT.

65. In addition to providing nondiscriminatory access to White Pages listings for customers of other CLECs' telephone exchange service and distributing White Pages directories, at CLEC's request, SWBT will include CLEC specific information (i.e., business office, residence office, repair bureau, etc.) in the White Pages directory on an "index-type" informational page. This page will also include specific information pertaining to other CLECs. At its option, the CLEC may provide SWBT with its logo and information in the form of a camera ready copy, sized at $1/8^{th}$ of a page. In those directories in which SWBT includes Spanish Customer Guide Pages, this informational page will also be provided in Spanish at the CLECs request, not to exceed $1/8^{th}$ of a page. To date, four CLECs have made arrangements or appear on index pages in SWBT's Oklahoma's directories. The informational page from the Oklahoma City White Pages Directory is attached as Schedule 13. CLECs may also choose to include their logo along with this carrier specific information. At its request, the CLEC may purchase "Informational Page(s)" in the informational section of the White Pages directory covering a geographic area. Such page(s) shall be no different in style, size, color and format than SWBT "Informational Pages." CLEC Information Pages will be included if provided in the form of camera-ready copy sixty (60) days prior to the directory close date.

66. Upon request from a facility-based CLEC, SWBT will transmit the CLEC's end user subscriber listing information to designated third party directory publishers (e.g., Yellow Pages) pursuant to the terms and conditions contained in the White Pages Appendix agreed to by the Parties.

INTERIM NUMBER PORTABILITY

67. Section 271(c)(2)(B)(xi) of the Act provides:

> "[U]ntil the date by which the Commission issues regulations pursuant to section 251 to require number portability," SWBT must provide "interim telecommunications number portability through remote call forwarding, direct inward dialing trunks, or other comparable arrangements, with as little impairment of functioning, quality, reliability, and convenience as possible. After that date, full compliance with such regulations."

68. Local Number Portability is a service arrangement whereby an end-user who remains at the same location is permitted to retain his existing telephone number when switching service from one switch-based local telecommunications carrier to another. SWBT's implementation of and compliance with the regulatory requirements for long term, or permanent, local number portability are described in detail in the Affidavit of Gary Fleming filed in support of this application.

69. Until such time as the actual assignment of the existing telephone number to the end user is made possible through implementation of local number portability, SWBT provides *Interim* Number Portability (INP). Through INP, SWBT end-users who switch to service provided by switch-based CLECs can continue to be reached at their old SWBT number even though, in most instances, those end-users are assigned a new, CLEC number.

70. The methods by which SWBT provides INP to requesting CLECs under the Act are described in more detail in the Affidavit of Bill Deere. My affidavit describes the processes and procedures which both SWBT and the CLEC must employ in

order to ensure service is transferred from SWBT to the CLEC end-user in a seamless, problem-free manner.

71. INP is provided only to switch-based CLECs, and only in those instances in which the CLEC has won a SWBT end-user and seeks to transfer service from SWBT. Accordingly, the provision of INP involves a physical transfer of service from SWBT to the CLEC. As described in greater detail below, this transfer of service requires a high degree of coordination and cooperation between SWBT and the CLEC in order to ensure that the transfer is accomplished with minimum disruption of the end-user's service.

72. On the SWBT side, an end-user conversion with INP is an integrated process which begins with the processing of INP orders by the SWBT Local Service Center (LSC). As set out in the Affidavit of Nancy Lowrance, the LSC acts as a single point of contact for all CLEC ordering for interconnection services and unbundled network elements.

73. INP-Remote orders are handled by the LSC on a manual basis. Once the order is received, it is distributed to a service representative who reviews it for accuracy and completeness. If necessary, calls are made to the CLEC to resolve order-related conflicts.

74. In order to provision INP, the LSC service representative enters orders into the SWBT systems to disconnect the end-user's SWBT dial tone and to activate INP by Remote Call Forwarding, which forwards the old SWBT telephone number to the end-user's new CLEC telephone number. The LSC service representative types

these INP orders into the exact same systems used by SWBT to provision vertical line features, including Remote Call Forwarding, for its own retail end-users.

75. A CLEC may order INP either "with loop," meaning it wishes to connect to its end-user by utilizing SWBT's unbundled loops, or "without loop," meaning it will use its own loop facilities. When an INP order is "with loop," the LSC service representative must also enter an order for cross-connection of the SWBT loop to the CLEC's collocated equipment. In Oklahoma, SWBT has provided INP both with and without loops. Diagrams depicting an INP conversion "with loop" and "without loop" are attached as Schedules 14 and 15 to my affidavit.

76. As illustrated in the attached diagrams, for each INP "with loop," a SWBT frame attendant must remove the cross-connect between the SWBT loop and the SWBT switch, and place a new cross connect from the SWBT loop to the CLEC switch. This change must occur at the same time Remote Call Forwarding is activated through a software change made by the SWBT network operations Recent Change Memory Administration Center (RCMAC). This work group is responsible for inputting software instructions to SWBT's switches, for all services offered by SWBT. The CLEC is responsible for making certain that its new number is activated in its switch, and that both the CLEC and the CLEC's end-user are ready to transfer service.

77. For INP "without loop," the CLEC is responsible for connecting the end-user's inside wiring to its loop facilities, installing the cross connect between its switch